

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

NORA HILGART-GRIFF et al.,)	
)	
Plaintiffs,)	Case No. 2:24-cv-13425
)	
v.)	Hon. Laurie J. Michelson
)	Mag. Elizabeth A. Stafford
REGENTS OF THE UNIVERSITY OF)	
MICHIGAN et al.,)	
)	
Defendants.)	

**DECLARATION OF MARTINO HARMON IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS THE COMPLAINT OR, IN THE
ALTERNATIVE, TO STRIKE PLAINTIFFS' CLASS ALLEGATIONS**

I, Martino Harmon, declare as follows:

1. I am the Vice President for Student Life at the University of Michigan (the "University"). I make this declaration in support of Defendants' motion to dismiss the Complaint filed in this action or, in the alternative, to strike Plaintiffs' class allegations. I have personal knowledge of the contents of this declaration and could testify thereto.

2. Through my role, I have personal involvement with the University's policies and proceedings at issue in this action, including the policies governing student and recognized student organization accountability proceedings as well as

those governing the use of University spaces.

3. Attached to my declaration as **Exhibit A** is a true and correct copy of the 2022 *Statement of Student Rights and Responsibilities*. Exhibit A is referenced in the Complaint at paragraphs 77 through 97, and is also quoted in paragraph 79.

4. Attached to my declaration as **Exhibit B** is a true and correct copy of the 2022 *Standards of Conduct for Recognized Student Organizations*. Exhibit B is referenced in the Complaint at paragraphs 172 through 173, 177, and 187.

5. Attached to my declaration as **Exhibit C** is a true and correct copy of the 2022 Student Organization Advancement and Recognition Accountability Procedure Manual. Exhibit C is referenced in the Complaint at paragraphs 173 through 179 and 181.

6. Attached to my declaration as **Exhibit D** is a true and correct set of screenshots of the University's Policies for Diag Use, available on the University's public website at the following URLs:

- <https://campusinvolvement.umich.edu/article/central-campus-diagnorth-campus-gerstacker-grove;>
- <https://campusinvolvement.umich.edu/article/diag-grove-reservation-1;>
- <https://campusinvolvement.umich.edu/article/diag-grove-reservation-2;>
- and
- [https://campusinvolvement.umich.edu/article/diag-grove-reservation-3.](https://campusinvolvement.umich.edu/article/diag-grove-reservation-3)

7. Attached to my declaration as **Exhibit E** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Nora Hilgart-Griff on June 3, 2024. Exhibit E is referenced in the Complaint at paragraph 142.

8. Attached to my declaration as **Exhibit F** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Jared Eno on June 3, 2024. Exhibit F is referenced in the Complaint at paragraph 141.

9. Attached to my declaration as **Exhibit G** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Kristen Bagdasarian on June 3, 2024. Exhibit G is referenced in the Complaint at paragraph 142.

10. Attached to my declaration as **Exhibit H** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Zaynab Omar Ibn Al-Khattab Elkolaly on June 3, 2024. Exhibit H is referenced in the Complaint at paragraph 143.

11. Attached to my declaration as **Exhibit I** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Rhea Chappell (legally “Nolan Chappell”) on June 3, 2024. Exhibit I is referenced in the Complaint at paragraph 143.

12. Attached to my declaration as **Exhibit J** is a true and correct copy of

the Office of Student Conflict Resolution complaint filed against Plaintiff Arwa Hassaballa on June 3, 2024. Exhibit J is referenced in the Complaint at paragraph 142.

13. Attached to my declaration as **Exhibit K** is a true and correct copy of the Student Organization Advancement and Recognition Accountability Process complaint filed against Students Allied for Freedom and Equality (SAFE) on October 31, 2024. Exhibit K is referenced in the Complaint at paragraphs 187 through 188.

14. Attached to my declaration as **Exhibit L** is the decision I issued on October 21, 2024, regarding the complaints referenced in the above paragraphs 6 through 11 of my declaration. Exhibit L is referenced in the Complaint at paragraphs 156 through 164, and is also quoted in paragraph 164.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of April, 2025, in Ann Arbor, Michigan.

A handwritten signature in black ink, appearing to read 'Martino Harmon', written over a horizontal line.

Martino Harmon
Vice President for Student Life
University of Michigan